

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BEATRICE A. OLUOUCH)

106 Moran Court)

Frederick, MD 21702)

PLAINTIFF,)

-against-)

STELLA KERUBO ORINA)

South B)

Kariba Estate, Gate #2)

Nairobi, Kenya)

DEFENDANT.)

Civil Action No.

11 CV 3117

NOTICE OF MOTION

Hon. Judge Griesa

PLEASE TAKE NOTICE that upon the annexed affirmation of Aaron Shapiro, Esq., affirmed on October 19, 2011, the accompanying Memorandum of Law in support of this motion, and the pleadings herein, Defendant will move this court before the Honorable Judge Griesa, United States District Judge, for an order pursuant to Rule 12(b)(5) of the Federal Rules of Civil Procedure, dismissing this complaint due to insufficient service of process.

The Shapiro Law Firm, LLC

Signature:


Aaron Shapiro, Esq.

11 Broadway, Suite 615

New York, NY 10004

Telephone: (212) 444-8064

Fax Number: (212) 981-2726

Email: aaron@theshapirolawyers.com

Attorney for Defendant

Dated: October 19, 2011

New York, New York